1 2	WENDY MEDURA KRINCEK, ESQ., Bar # 6417 ETHAN D. THOMAS, ESQ., Bar # 12874 LITTLER MENDELSON, P.C.		
	3960 Howard Hughes Parkway		
3	Suite 300 Las Vegas, NV 89169-5937		
4	Telephone: 702.862.8800 Fax No.: 702.862.8811		
5	Attorneys for Defendant		
6	UNILEVER MANUFACTURING (US), INC.		
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
11	MARGARET WYATT, an individual,	Case No. 2:15-cv-01403-APG-CWH	
12	Plaintiff,		
13	vs.	[PROPOSED] STIPULATION AND ORDER TO EXTEND TIME FOR	
14	UNILEVER MANUFACTURING (US), INC., a Foreign Corporation; DOES and	DEFENDANT TO FILE RESPONSIVE PLEADING	
15	ROES 1 through 15, inclusive,	(FIRST REQUEST)	
16	Defendant.	(FIRST REQUEST)	
17	Plaintiff MARGARET WYATT and Defendant UNILEVER MANUFACTURING (US),		
18	INC., by and through their undersigned counsel, hereby agree and stipulate to extend the time for		
19	Defendant to file a responsive pleading from the current deadline of September 21, 2015 up to and		
20	including September 28, 2015.		
21	Such extension is necessary in light of Defense counsel's current workload in other cases		
22	having recently returned to the office from paternity leave. The additional time will allow Defense		
23	counsel to continue to analyze the Complaint and prepare a sufficient responsive pleading.		
24	///		
25			
26	///		
27	///		
28	///		
LITTLER MENDELSON, P.C ATTORNEYS AT LAW 3960 Howard Hughes Parkway Suite 300 Las Vegas, NV 89169-5937 702.862.8800			

## 

1	This is the first request for an extension of time to respond to the Complaint. This request i		
2	made in good faith and not for the purpose of delay.		
3	Dated: September 17, 2015	Dated: September 17, 2015	
4	Respectfully submitted,	Respectfully submitted,	
5			
6	/s/ Patrick W. Kang	/s/ Ethan D. Thomas	
7	PATRICK W. KANG, ESQ. ERICA D. LOYD, ESQ. KYLE R. TATUM, ESQ.	WENDY MEDURA KRINCEK, ESQ. ETHAN D. THOMAS, ESQ.	
8	KYLE R. TATUM, ESQ. KANG & ASSOCIATES, PLLC.	LITTLER MENDELSON, P.C.	
9	Attorneys for Plaintiff MARGARET WYATT	Attorneys for Defendant UNILEVER MANUFACTURING (US), INC.	
10			
11		ODDED	
12		ORDER	
13		IT IS SO ORDERED.	
14		September 18 Dated:, 2015.	
15		Cust	
16			
17		UNITED STATES MAGISTRATE JUDGE	
18 19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
-			

LITTLER MENDELSON, P.O.
ATTORNEYS AT LAW
3980 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
702.862.8800

2.